

Connect America Phase II Challenge Process Form
OMB Control Number 3060-1188
FCC Form 505

Filing Entity: LESLIE COUNTY TELEPHONE COMPANY

FRN (if applicable): 0003767043

Name of Person Filling Out Form: Timothy Ulrich

Mailing Address of Person Filling Out Form: 525 Junction Road, Madison, Wisconsin, 53717

Email Address of Person Filling Out Form: timothy.ulrich@tdstelecom.com

Phone Number of Person Filling Out Form: 608-664-4114

Name of Person Certifying Data within Form: Andrew Petersen

Mailing Address of Person Certifying Data within Form: 525 Junction Road, Madison, Wisconsin, 53717

Email Address of Person Certifying Data within Form: andrew.petersen@tdstelecom.com

Phone Number of Person Certifying Data within Form: 608-664-4155

Response to Challenge

Common Block 15 Ohio FIPS Code	211939704001020	KY	Windsream	PRM of Entity Making Initial Challenge of provided	Insert X if Speed Criteria is at Issue	X	Insert X if Usage Allowance Criteria is at Issue	X	Insert X if Latency Criteria is at Issue	X	Insert X if Price Criteria is at Issue	X	Insert X if Voice Criteria is at Issue	X	Type of Supporting Evidence App A-Statement of Manager; App B-Network Plant Map; App C-Advertising Materials	Additional Comments TDS Telecom Subsidiary; LESLIE COUNTY TELEPHONE COMPANY	OMG# Central Number 996011161
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Certifications and Additional Information

OMB Control Number 3060-1188

Accuracy and Due Diligence Certification

All Filers Must Fill Out

By initialing below, I certify that all statements contained in the attached form are true and accurate to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these claims.

Certifier's Initials:

AS

Andrew S. Petersen, TDS Telecom, Vice-President, External Affairs & Communications

Date: 10/31/2014

Notice of Challenge Certification

(Served to Unserved and Unserved to Served Challengers Fill Out One of the Following Blocks - Respondents Do Not Fill Out)

Service of Notice Successful

By initialing below, I certify that notice of this challenge has been served on all interested parties.

Certifier's Initials:

Date:

Service of Notice Unsuccessful

By initialing below I certify that, following a good faith effort, I was unable to serve notice of this challenge on all interested parties due to lack of information regarding the address of such parties.

Name of Party/Parties
that Could Not Be

Served:

Certifier's Initials:

Date:

The certifications on this page are subject to the penalties for false statements under 18 U.S.C. 1001.

Attachment A

Declaration of Timothy W. Ulrich
Manager-Federal Affairs (ILEC & Cable)

Declaration of Timothy W. Ulrich

1. My name is Timothy W. Ulrich. I am currently Manager-Federal Affairs for TDS Telecommunications Corporation (TDS Telecom) including Leslie County Telephone Company (Leslie County)¹. My responsibilities include, among others matters, managing the federal activities including the preparation and filing of data for the National Broadband Map, assessing the competitive nature of our ILEC markets, analyzing the results of the Connect America Cost Model, and overseeing the mapping of exchange boundaries.
2. The purpose of this Declaration is to respond to Windstream's served-to-unserved challenge of Leslie County's census block(s) listed in accompanying Form 505. Given that the census blocks fall completely within a rate-of-return exchange where the incumbent local exchange carrier already provides voice and broadband service, the census blocks identified in the accompanying FCC Form 505 should be deemed as served counter to Windstream's serve-to-unserved challenge, and should not be included on the list of areas eligible for CAF Phase II support.
 - a. Leslie County is a rate-of-return incumbent local exchange carrier operating in the state of Kentucky (FRN: 0003767043; SAC: 260411). Leslie County provides voice and broadband service in its Dwarf Exchange where the census blocks that are subject of Windstream's challenge are located.
 - b. Per FCC Public Notice DA 14-1397, "Only price cap territories are eligible for Phase II support; therefore, there is no need to adjudicate whether a non-price cap territory census block is served or unserved by an unsubsidized competitor."

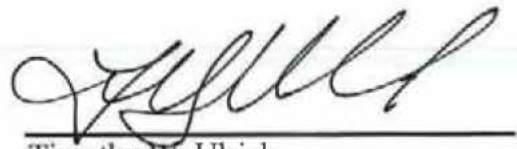
¹ TDS Telecom provides broadband, video and voice telecommunications services and hosted and managed services in three reportable segments: Wireline, Cable and HMS. TDS Telecom's Wireline and Cable operations served 1,113,200 customer connections at June 30, 2014. TDS Telecom operates 118 study areas (including Leslie County) that are incumbent, exclusively rural local exchange carriers (ILEC) serving commercial and residential customers in twenty-eight (28) states.

3. Leslie County's Response is based upon the information I ascertained and verified from the Manager-Billing Operations, Manager-Network Infrastructure Planning, GIS II Senior Specialist, and Consumer Marketing. I personally oversaw and reviewed the preparation and analysis of the following:
- a. TDS Telecom prepared network maps (that plot the service nodes and location of all of the serviceable addresses-current and past customers service addresses) located within Leslie County's Dwarf Exchange along with superimposing the boundaries of the challenged census blocks and Leslie County exchange boundaries (the study area boundaries used are those submitted and certified as of March 17, 2014)². (See attachment B for Network Maps).
 - b. Customer bills were extracted and reviewed to verify that Leslie County does have current and past customers that receive voice and/or broadband service at the addresses within these census blocks. Due to the privacy issues associated with customer's bills (CPNI considerations) and the concern voiced by the FCC Bureau, it was determined not to file a copy of the actual customer bills even if redacted. I, however, do attest that bills and records exist showing that current and past customers have received voice and/or broadband service at the addresses located within these census blocks.
 - c. Advertising materials were reviewed and verified that voice and broadband service offerings are currently being offered in the locations where these census blocks are located. Pricing materials were reviewed and verified that the rates for voice and broadband services in these census blocks are below the urban voice and broadband benchmarks. (See Attachment C for advertising materials).

² Wireline Competition Bureau Publishes Online Map of Submitted Study Area Boundaries, Announces Procedures for Filing Revised Data, WC Docket Nos. 10-90, 05-337, Public Notice, DA 13-2296 (Wireline Comp. Bur. rel. Dec. 2, 2013).

4. CONCLUSION: As these network maps depict, these census blocks fall entirely within Leslie County Dwarf exchange rate-of-return study area (SAC: 260411) and no portion of the census block falls in a price cap carrier's study area. Also, Leslie County provides voice and broadband service in these census blocks at the required speeds and performance measures, and can provision voice and broadband services to these customers in the required timeframes. Given that the census blocks fall completely within a rate-of-return exchange where the incumbent local exchange carrier already provides voice and broadband service, the census blocks identified in the accompanying FCC Form 505 should be deemed as served counter to Windstream's serve-to-unserved challenge, and should not be included on the list of areas eligible for CAF Phase II support.

I declare that the foregoing is true to the best of my knowledge, information, and belief.



Timothy W. Ulrich
Manager-Federal Affairs
ILEC & Cable

Dated: *October 31, 2014*

Attachment B

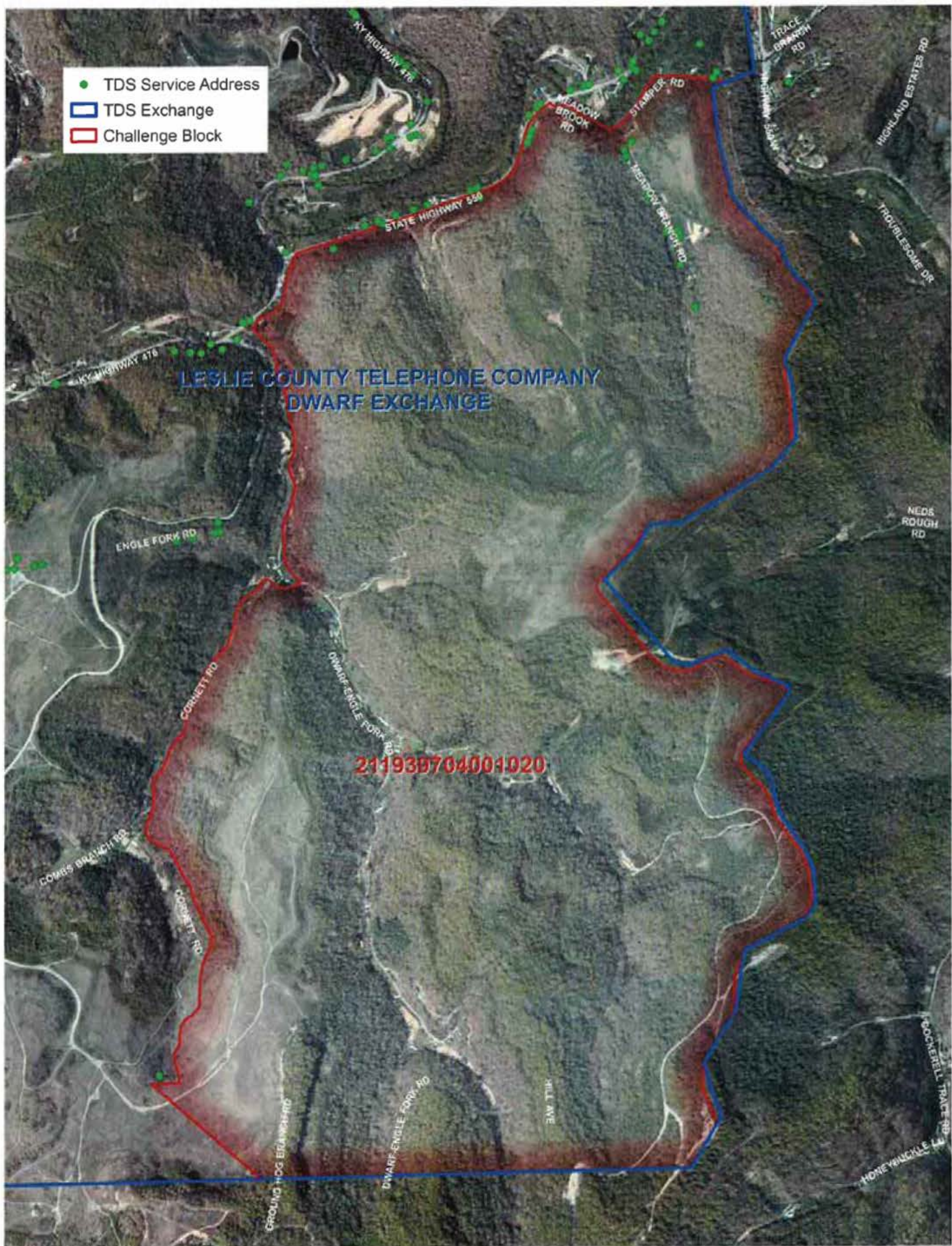
Network Plant Maps

The enclosed network plant maps plot the service nodes and serviceable addresses for the census blocks that are subject of this filing.

- TDS Service Address
- TDS Exchange
- Challenge Block

LESLIE COUNTY TELEPHONE COMPANY
DWARF EXCHANGE

211930704004020



Attachment C

Advertising Materials

The enclosed advertising materials are screenshots from TDS Telecom's website and are advertised in local media outlets for the areas that are the subject of this filing. The materials highlight the service offering of basic phone and high-speed broadband service to the census blocks.

[Business Services](#)[Contact Us](#)[About TDS®](#)[TDS News](#)[Careers](#)[Phone Book](#)[View Cart](#)[Bundles](#)[Internet](#)[Phone](#)[Specials](#)[TDS Email](#)[Sign Up](#)Your current location is: **Madison, WI.** [Change location](#)[TV](#)[My Account](#)[Help and Support](#)

Time well spent is
money well saved.



Order TDS® High-Speed Internet plus phone and your discounted price won't budge for two years. Plus, there's no contract to sign!

Select your services:**High-Speed Internet**☐ Extreme: [details](#)**\$34.95/mo.** for 2 years☐ Turbo: [details](#)**\$19.95/mo.** for 2 years☐ Express: [details](#)**\$14.95/mo.** for 2 years[Compare Internet Speeds](#)**Phone Packages**☐ 5-Star Package: [details](#)**\$39.99/mo.** for 2 years☐ 4-Star Package: [details](#)**\$29.99/mo.** for 2 years☐ 3-Star Package: [details](#)**\$19.99/mo.** for 2 years☐ I want to keep my existing TDS Phone package:



ORDER BY PHONE
1-877-707-3811



TDS Internet + Phone

Starting at
\$34⁹⁴/mo

- Up to 5Mbps download speed
- Fast speed to check e-mail, social media and stream videos on multiple devices
- Unlimited local calling

Check Availability at your address

Street address:

Unit/Apt#:

Zip Code:

Email Address

SHOW TDS OFFERS



Your information is kept confidential. See [Privacy](#)

Call to place an order by phone: 1-877-707-3811

Compare Qualifying TDS Bundles

Price	No Contract Internet	No Contract Phone
Express Internet + 3 Star Double Play \$34.94	Express with up to 5Mbps speed	Unlimited local calling 30 long distance minutes, calling features
Turbo Internet + 5 Star Double Play \$59.94	Turbo with up to 15Mbps speed	Unlimited local calling unlimited long distance minutes, calling features

Bundling with TDS

No contract required! Enjoy the benefits of your internet and phone bundle as long as you want with no commitment





ORDER BY PHONE
1-877-707-3811

[Bundles](#)[Internet](#)[Phone](#)

High Speed Internet

Check Availability at your address

Starting at

\$24⁹⁵/mo

- Up to 5 Mbps download speed
- Faster uploads and downloads
- 24/7 technical support

[SHOW TDS OFFERS](#)

Your information is kept
confidential. See [Privacy](#)

Call to place an order by phone: 1-877-707-3811

How Fast Do You Want to Go?

Price	Internet Name	Internet Speed
Express Internet \$24.95	Express	Up to 5Mbps
Extreme Internet \$44.95	Extreme	Up to 25Mbps

Internet Speeds

TDS offers the internet speed that is best for you. From casual users who shop and check their social networks to power users who stream movies and download large files.





ORDER BY PHONE
1-877-707-3811

[Bundles](#)[Internet](#)[Voice](#)

TDS Voice Packages

Check Availability at your address

Starting at

\$19⁹⁹/mo

- Unlimited calling
- Popular calling features like Caller ID, Call waiting and Call Forwarding

[SHOW TDS OFFERS](#)

Your information is kept
confidential. See [Privacy](#)

Call to place an order by phone: 1-877-707-3811

Choose the Package that Meets Your Calling Style

Price	Long Distance	Local Calling	Features
3 Star \$19.99	30 min.	Unlimited	Caller ID, Call Waiting, Call Forwarding and more
5 Star \$29.99	Unlimited	Unlimited	Caller ID, Call Waiting, Call Forwarding 3-way Calling, Voice Mail and more